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Attorneys for Plaintiff

IN THE UNITED STATES DISTRICT COURT
FOR THE DISTRICT OF ALASKA

UNITED STATES OF AMERICA,)	No. 4:21-cr-00002-RRB-SAO
)	
Plaintiff,)	<u>COUNT I:</u>
)	SEX TRAFFICKING OF A MINOR
vs.)	Vio. of 18 U.S.C. § 1591(a)(1), (b)(1)
)	
WALLY CARTER,)	
)	
Defendant.)	
_____)	

INDICTMENT

The Grand Jury charges that:

COUNT I

Beginning on a date unknown to the Grand Jury, but no later than on or about July 2014, and continuing to a date unknown to the Grand Jury, but no later than July 2017, the defendant, WALLY CARTER, in the District of Alaska at or near Kotzebue, in and

affecting interstate and foreign commerce, did knowingly recruit, entice, harbor, transport, provide, obtain, advertise, maintain, patronize, and solicit by any means a person, to wit: Victim A, to engage in a commercial sex act, having had a reasonable opportunity to observe the person, and knowing and in reckless disregard of the fact that Victim A had not attained the age of 14 years and would be caused to engage in a commercial sex act.

All of which is a violation of 18 U.S.C. § 1591(a)(1), (b)(1).

A TRUE BILL.

s/ Grand Jury Foreperson
GRAND JURY FOREPERSON

s/ Kyle Reardon for
DANIEL DOTY
Assistant U.S. Attorney
United States of America

s/ Bryan Schroder
BRYAN SCHRODER
United States Attorney
United States of America

DATE: 1/19/2021